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Michael L. Certzberg  
275 Madison Ave.  
New York, NY 10016  
(212) 679-1167

Stephen A. Lenske  
Lawrence E. Heller  
LENSKE, LENSKE & HELLER  
6400 Canoga Ave., Ste 315  
Woodland Hills, CA 91367  
(818) 716-1444

Attorneys for Defendant  
AUTHOR SERVICES, INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

VICKI J. AZNARAN and	)	CASE No. CV 88-1786 JMI (Ex)
RICHARD N. AZNARAN,	)	
	)	ANSWER OF AUTHOR SERVICES, INC.
Plaintiffs,	)	
	)	
v.	)	
	)	
CHURCH OF SCIENTOLOGY OF	)	
CALIFORNIA, et al.,	)	
	)	
Defendants.	)	

Defendant Author Services, Inc. (hereinafter "Defendant"),  
for itself only and for no other Defendant, answers plaintiffs'  
complaint in this action as follows:

1. Defendant admits the averments of paragraph 1 insofar  
as there is diversity of citizenship but denies that the amount  
in controversy between plaintiffs and this Defendant exceeds  
\$10,000. This Defendant admits that it has its principal  
offices within this district. This Defendant neither admits nor  
denies the averments pertaining to other defendants and says  
that said averments should be answered by said other defendants

1 if and when they are required to do so. Defendant lacks  
2 knowledge or information sufficient to form a belief as to the  
3 truth of the remainder of the averments and, on that ground,  
4 denies those averments.

5 2. Defendant is informed and believes and on that basis  
6 admits the truth of the averments in paragraph 2.

7 3. This Defendant admits that it is a California  
8 corporation, doing business in the State of California. This  
9 Defendant neither admits nor denies the averments pertaining to  
10 other defendants and says that said averments should be answered  
11 by said other defendants if and when they are required to do so.

12 4. This Defendant lacks knowledge or information  
13 sufficient to form a belief as to the truth of the averments  
14 contained in paragraph 4 and on that basis denies each of these  
15 averments.

16 5. This Defendant neither admits nor denies the averments  
17 pertaining to other defendants and says that said averments  
18 should be answered by said other defendants if and when they are  
19 required to do so.

20 6. This Defendant denies each and every averment of  
21 paragraph 6.

22 7. This Defendant denies each and every averment of  
23 paragraph 7.

24 8. This Defendant denies each and every averment of  
25 paragraph 8.

26 9. This Defendant is informed and believes and on that  
27 basis admits that plaintiffs were members of Churches of  
28 Scientology at various times. Defendant lacks knowledge or

1 information sufficient to form a belief as to the truth of the  
2 remainder of the averments and, on that ground, denies those  
3 averments.

4 10. This Defendant denies each and every averment of  
5 paragraph 10.

6 11. This Defendant denies each and every averment of  
7 paragraph 11.

8 12. This Defendant denies each and every averment of  
9 paragraph 12.

10 13. This Defendant denies each and every averment of  
11 paragraph 13.

12 14. This Defendant denies each and every averment of  
13 paragraph 14.

14 15. This Defendant denies that Vicki Aznaran was employed  
15 by this defendant. Defendant lacks knowledge or information  
16 sufficient to form a belief as to the truth of the remainder of  
17 the averments and, on that ground, denies those averments.

18 16. This Defendant denies each and every averment of  
19 paragraph 16.

20 17. This Defendant denies that Richard Aznaran worked as  
21 a security specialist for this Defendant. Defendant lacks  
22 knowledge or information sufficient to form a belief as to the  
23 truth of the remainder of the averments and, on that ground,  
24 denies those averments.

25 18. This Defendant denies each and every averment of  
26 paragraph 18.

27 19. This Defendant denies each and every averment of  
28 paragraph 19.

1           20. Defendant lacks knowledge or information sufficient to  
2 form a belief as to the truth of the averments and, on that  
3 ground, denies those averments.

4           21. This Defendant denies each and every averment of  
5 paragraph 21.

6           22. This Defendant denies each and every averment of  
7 paragraph 22.

8           23. This Defendant denies each and every averment of  
9 paragraph 23.

10           24. Defendant lacks knowledge or information sufficient to  
11 form a belief as to the truth of the averments and, on that  
12 ground, denies those averments.

13           25. Defendant lacks knowledge or information sufficient to  
14 form a belief as to the truth of the averments and, on that  
15 ground, denies those averments.

16           26. Defendant denies that plaintiffs were in contact with  
17 it or under its control and denies the remainder of the  
18 averments in paragraph 26.

19           27. This Defendant denies each and every averment of  
20 paragraph 27.

21           28. This Defendant denies each and every averment of  
22 paragraph 28.

23           29. In answering the averments contained in paragraph 29  
24 wherein plaintiffs adopt by reference paragraphs 2 through 28 of  
25 their common averments, this Defendant admits, denies and avers  
26 to the same effect and in the same manner as this Defendant  
27 admitted, denied and averred with respect to those specific  
28 paragraphs as previously set forth in this answer.

1           30. This Defendant denies each and every averment of  
2 paragraph 30.

3           31. This Defendant denies each and every averment of  
4 paragraph 31.

5           32. This Defendant denies each and every averment of  
6 paragraph 32.

7           33. This Defendant denies each and every averment of  
8 paragraph 33.

9           34. In answering the averments contained in paragraph 34  
10 wherein plaintiffs adopt by reference paragraphs 2 through 33 of  
11 their complaint, this Defendant admits, denies, and avers to  
12 the same effect and in the same manner as this Defendant  
13 admitted, denied and averred with respect to those specific  
14 paragraphs as previously set forth in this Answer.

15           35. This Defendant admits that Churches of Scientology  
16 render religious services of a spiritual nature based on the  
17 religious beliefs of Scientology. This Defendant denies the  
18 remainder of the averments contained in paragraph 35.

19           36. This Defendant denies each and every averment of  
20 paragraph 36.

21           37. This Defendant denies each and every averment of  
22 paragraph 37.

23           38. This Defendant denies each and every averment of  
24 paragraph 38.

25           39. In answering the averments contained in paragraph 39  
26 wherein plaintiffs adopt by reference paragraphs 2 through 39 of  
27 their complaint, this Defendant admits, denies and avers to  
28 the same effect and in the same manner as this Defendant

1 admitted, denied and averred with respect to those specific  
2 paragraphs as previously set forth in this Answer.

3 40. This Defendant admits that Churches of Scientology  
4 render religious services of a spiritual nature based on the  
5 religious beliefs of Scientology. This Defendant denies the  
6 remainder of the averments contained in paragraph 40.

7 41. This Defendant denies each and every averment of  
8 Paragraph 41.

9 42. This Defendant denies each and every averment of  
10 Paragraph 42.

11 43. In answering the averments contained in Paragraph 43  
12 wherein plaintiffs adopt by reference paragraphs 2 through 42 of  
13 their complaint, this Defendant admits, denies, and avers to  
14 the same effect and in the same manner as this Defendant  
15 admitted, denied and averred with respect to those specific  
16 paragraphs as previously set forth in this Answer.

17 44. This Defendant denies each and every averment of  
18 paragraph 44.

19 45. This Defendant denies each and every averment of  
20 paragraph 45.

21 46. This Defendant denies each and every averment of  
22 paragraph 46.

23 47. In answering the averments contained in paragraph 47  
24 wherein plaintiffs adopt by reference paragraphs 2 through 46 of  
25 their complaint, this Defendant admits, denies, and avers to  
26 the same effect and in the same manner as this Defendant  
27 admitted, denied and averred with respect to those specific  
28 paragraphs previously set forth in this Answer.

1           48. This Defendant denies each and every averment of  
2 paragraph 48.

3           49. This Defendant denies each and every averment of  
4 paragraph 49.

5           50. This Defendant denies each and every averment of  
6 paragraph 50.

7           51. This Defendant denies each and every averment of  
8 paragraph 51.

9           52. This Defendant denies each and every averment of  
10 paragraph 52.

11           53. In answering the averments contained in paragraph 53  
12 wherein plaintiffs adopt by reference paragraphs 2 through 52 of  
13 their complaint, this Defendant admits, denies, and alleges to  
14 the same effect and in the same manner as this Defendant  
15 admitted, denied and averred with respect to those specific  
16 paragraphs previously set forth in this Answer.

17           54. This Defendant admits that Churches of Scientology  
18 render religious services of a spiritual nature based on the  
19 religious beliefs of Scientology. This Defendant denies the  
20 remainder of the averments contained in paragraph 54.

21           55. This Defendant denies each and every averment of  
22 paragraph 55.

23           56. This Defendant denies each and every averment of  
24 paragraph 56.

25           57. This Defendant denies each and every averment of  
26 paragraph 57.

27           58. This Defendant denies each and every averment of  
28 paragraph 58.

1           59. This Defendant denies each and every averment of  
2 paragraph 59.

3           60. In answering the averments contained in paragraph 60  
4 wherein plaintiffs adopt by reference paragraphs 2 through 59 of  
5 their complaint, this Defendant admits, denies and avers to  
6 the same effect and in the same manner as this Defendant  
7 admitted, denied and averred with respect to those specific  
8 paragraphs previously set forth in this Answer.

9           61. This Defendant denies each and every averment of  
10 paragraph 61.

11           62. This Defendant denies each and every averment of  
12 paragraph 62.

13           63. This Defendant denies each and every averment of  
14 paragraph 63.

15           64. In answering the averments contained in paragraph 60  
16 wherein plaintiffs adopt by reference paragraphs 2 through 59 of  
17 their complaint, this Defendant admits, denies and avers to  
18 the same effect and in the same manner as this Defendant  
19 admitted, denied and averred with respect to those specific  
20 paragraphs previously set forth in this Answer.

21           65. This Defendant lacks knowledge or information  
22 sufficient to form a belief as to the truth of the averments  
23 contained in paragraph 65 and on that basis denies each of these  
24 averments.

25           66. This Defendant denies each and every averment of  
26 paragraph 66.

27           67. This Defendant denies each and every averment of  
28 paragraph 67.



1           68. This Defendant denies each and every averment of  
2 paragraph 68.

3           69. This Defendant denies each and every averment of  
4 paragraph 69.

5           70. In answering the averments contained in paragraph 70  
6 wherein plaintiffs adopt by reference paragraphs 2 through 69 of  
7 their complaint, this Defendant admits, denies, and avers to  
8 the same effect and in the same manner as this Defendant  
9 admitted, denied and averred with respect to those specific  
10 paragraphs previously set forth in this Answer.

11           71. This Defendant denies each and every averment of  
12 paragraph 71.

13           72. This Defendant denies each and every averment of  
14 paragraph 72.

15           73. This Defendant denies each and every averment of  
16 paragraph 73.

17           74. This Defendant denies each and every averment of  
18 paragraph 74.

19           75. This Defendant denies each and every averment of  
20 paragraph 75.

21           76. In answering the averments contained in paragraph 76  
22 wherein plaintiffs adopt by reference paragraphs 2 through 75 of  
23 their complaint, this Defendant admits, denies, and avers to  
24 the same effect and in the same manner as this Defendant  
25 admitted, denied and averred with respect to those specific  
26 paragraphs previously set forth in this Answer.

27           77. This Defendant denies each and every averment of  
28 paragraph 77.

1           78. This Defendant denies each and every averment of  
2 paragraph 78.

3           79. This Defendant denies each and every averment of  
4 paragraph 79.

5           80. In answering the averments contained in paragraph 80  
6 wherein plaintiffs adopt by reference paragraphs 2 through 79 of  
7 their complaint, this Defendant admits, denies, and avers to  
8 the same effect and in the same manner as this Defendant  
9 admitted, denied and averred with respect to those specific  
10 paragraphs previously set forth in this Answer.

11           81. This Defendant admits that Churches of Scientology  
12 render religious services of a spiritual nature based on the  
13 religious beliefs of Scientology. This Defendant denies the  
14 remainder of the averments contained in paragraph 81.

15           82. This Defendant denies each and every averment of  
16 paragraph 82.

17           83. This Defendant denies each and every averment of  
18 paragraph 83.

19           84. This Defendant denies each and every averment of  
20 paragraph 84.

21           85. This Defendant denies each and every averment of  
22 paragraph 85.

23                           FIRST AFFIRMATIVE DEFENSE

24           86. The Complaint fails to state any claim upon which  
25 relief may be granted.

26                           SECOND AFFIRMATIVE DEFENSE

27           87. Plaintiffs' claims in this action, and each of them,  
28 are barred by applicable statutes of limitations, including but

1 not limited to, those found in California Code of Civil  
2 Procedure §§ 338(1), 338(3), 338(4), 339(1), 340(1), 340(3),  
3 and 343.

4 THIRD AFFIRMATIVE DEFENSE

5 88. The claims asserted by Vicki Aznaran, and each of  
6 them, are barred by a Mutual Settlement and Release, dated  
7 April 9, 1987, duly executed by Vicki Aznaran. The release  
8 between the parties covers and includes each claim in the  
9 Complaint and precludes Vicki Aznaran from bringing these  
10 claims, and each of them, or any other claims against Defendant.

11 FOURTH AFFIRMATIVE DEFENSE

12 89. The claims asserted by Richard Aznaran, and each of  
13 them, are barred by a Mutual Settlement and Release, dated  
14 April 9, 1987 duly executed by Richard Aznaran. The release  
15 between the parties covers and includes each claim in the  
16 Complaint and precludes Richard Aznaran from bringing these  
17 claims, and each of them, or any other claims against Defendant.

18 FIFTH AFFIRMATIVE DEFENSE

19 90. Certain claims asserted by Richard Aznaran are barred  
20 by a Declaration and Release of Claims dated April 9, 1987,  
21 executed by Richard Aznaran.

22 SIXTH AFFIRMATIVE DEFENSE

23 91. The duly executed Mutual Settlement and Releases and  
24 Declaration and Release of Claims described herein constitute an  
25 accord and satisfaction of each and every claim made in the  
26 Complaint.

27 SEVENTH AFFIRMATIVE DEFENSE

28 92. Plaintiffs, and each of them, have waived all right,

1 if any they ever had, to any and all recovery sought by the  
2 Complaint.

3 EIGHTH AFFIRMATIVE DEFENSE

4 93. Plaintiffs at all times voluntarily, knowingly and  
5 willingly assumed any and all risk arising from their  
6 participation in and/or association with the defendant herein  
7 with respect to all incidents and activities, including those  
8 referred to in the Complaint. Any and all claimed "injuries" or  
9 damages were proximately caused by plaintiffs' own conduct.

10 NINTH AFFIRMATIVE DEFENSE

11 94. Plaintiffs' claims, and each of them, are barred by  
12 applicable principles of the First Amendment to the  
13 Constitution. The complaint impermissibly intrudes on rights  
14 held by Defendant and others to privacy and association, to  
15 religious free exercise, and to freedom from excessive  
16 governmental entanglement in religious affairs.

17 TENTH AFFIRMATIVE DEFENSE

18 95. Plaintiffs' claims, and each of them, are barred by  
19 the doctrine of contributory negligence in that plaintiffs' own  
20 actions are a proximate legal cause for any injury or damages  
21 suffered by them. Plaintiffs, willfully and with knowledge,  
22 voluntarily entered into membership in the Scientology religion,  
23 and remained parishioners and employees of various  
24 Scientology-affiliated entities even after attaining high levels  
25 of training and responsibility within said entities.

26 ELEVENTH AFFIRMATIVE DEFENSE

27 96. Relative to the acts or conduct alleged by plaintiffs,  
28 Defendant as a matter of law is not and has never been the

1 agent, servant, employee, partner, associate, joint venturer,  
2 co-participant, co-conspirator, or principal of any other  
3 Defendant. Accordingly, Defendant is not liable to plaintiffs  
4 for any of the acts complained of.

5 TWELFTH AFFIRMATIVE DEFENSE

6 97. Plaintiffs, after discovery of all the facts which  
7 allegedly constituted defendants' fraudulent activity, made  
8 ratification thereof by their conduct.

9 THIRTEENTH AFFIRMATIVE DEFENSE

10 This Defendant asserts that recovery is barred by the  
11 doctrine of unclean hands.

12 WHEREFORE, Defendant prays for relief as follows:

- 13 1) That plaintiffs take nothing by their Complaint;  
14 2) That Defendant recover its costs of suit herein;  
15 3) That Defendant recover its attorneys' fees and costs of  
16 defending the suit herein; and  
17 4) That the Court award such further relief as it may deem  
18 proper.

19 Dated: September 19, 1988

Respectfully submitted,

20 MICHAEL HERTZBERG

21 LENSKE, LENSKE & HELLER

22 By: *L. Heller*  
23 LAWRENCE E. HELLER

24 Attorneys for Defendant  
25 AUTHOR SERVICES, INC.  
26  
27  
28

PROOF OF SERVICE

STATE OF CALIFORNIA     )  
                                  )   ss.  
COUNTY OF LOS ANGELES   )

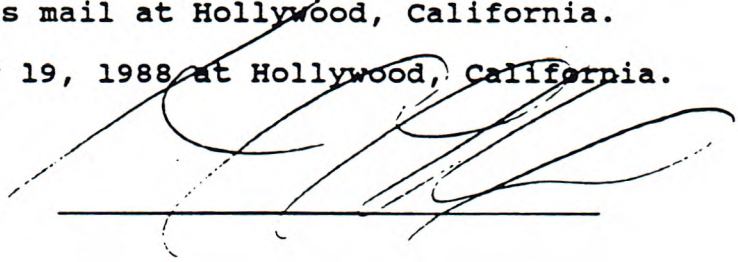
I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Hollywood, California 90028.

On September 19, 1988, I served the foregoing document described as ANSWER OF AUTHOR SERVICES, INC. on interested parties by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Hollywood, California, addressed as follows:

SEE ATTACHED LIST

If hand service is indicated on the attached list, I caused such envelope to be served by hand, otherwise I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Hollywood, California.

Executed on September 19, 1988 at Hollywood, California.



A handwritten signature in black ink is written over a horizontal line. The signature is stylized and appears to be the name of the person who executed the document.

SERVICE LIST

AZNARAN V. CHURCH OF SCIENTOLOGY  
OF CALIFORNIA, ET AL.,

CIVIL ACTION NO. 88-1786-JMI (Ex)

Howard L. Weitzman  
WYMAN, BAUTZER, KUCHEL & SILBERT  
2049 Century Park East  
Los Angeles, California 90067

Eric Lieberman  
RABINOWITZ, BOUDIN, STANDARD,  
KRINSKY & LIEBERMAN, P.C.  
740 Broadway at Astor Place  
New York, New York 10003-9518

Kendrick L. Moxon  
BOWLES & MOXON  
6255 Sunset Blvd.  
Suite 2000  
Hollywood, CA 90028

Richard and Vicki Aznaran  
5435 Belmont  
Dallas, Texas 75206

Earle C. Cooley  
COOLEY, MANION, MOORE & JONES, P.C.  
530 Atlantic Avenue  
Boston, MA 02210